

**THE LAMPO GROUP, LLC d/b/a
RAMSEY SOLUTIONS,
a Tennessee Limited Liability Company,**

V.

Defendant.

V.

Counter-Defendant.

JURY DEMAND

Case 3:20-cv-00641 Document 46 Filed 05/14/21 Page 1 of 3 PageID #: 530

1. Currently, the disclosure date for the party that bears the burden of proof on an issue is May 24, 2021, and the disclosure date for the party that does not bear the burden of proof on an issue is July 23, 2021.

2. Although the parties have been working cooperatively on discovery and other issues, additional time is needed to finalize expert reports. This is due in part to the fact that certain necessary personnel of Ramsey Solutions will be out of the office for much of May. Marriott does not oppose adjusting the deadlines as outlined herein. The parties will continue to work diligently to timely complete all necessary pre-trial requirements and as outlined above have been working cooperatively to do so.

3. The parties are requesting to modify the Scheduling Order as follows:

a. Expert Deadlines: Deadlines to identify and disclose all expert witnesses and reports would be changed to:

- i. **June 25, 2021** for the party who bears the burden of proof on an issue for which expert testimony is offered; and
- ii. **August 23, 2021** for the party who does not bear the burden of proof on an issue for which expert testimony is offered.

4. The Motion is not interposed for any improper purpose or to cause delay. The parties are hopeful that the above modifications to the scheduling order will allow them to efficiently complete their expert disclosures. Further, the above changes do not in any way impact the existing Order Setting Case For Trial. [Dkt. 32]

WHEREFORE, based on the foregoing, the parties jointly move to modify the Scheduling Order as outlined herein.

Respectfully submitted,

Steven M. Rudner, appearing *pro hac vice*
John C. Josefsberg, appearing *pro hac vice*
RUDNER LAW OFFICES
12740 Hillcrest Road, Suite 240
Dallas, TX 75230
Telephone: (214) 373-1900
Facsimile: (214) 360-7845
Rudner@HotelLawyers.com
josefsberg@HotelLawyers.com

Stephen J. Zralek, No. 18971
BONE MCALLESTER NORTON PLLC
511 Union St., Ste. 1000*
Nashville, TN 37219
Telephone: (615) 238-6305
Facsimile: (615) 687-2763
szralek@bonelaw.com
Counsel for Marriott Hotel Services, Inc.

/s/ John C. Josefsberg_____

Counsel for Marriott Hotel Services

Jennifer G. Altman, *pro hac vice*
Markenzy Lapointe, *pro hac vice*
PILLSBURY WINTHROP SHAW
PITTMAN LLP
600 Brickell Avenue, Suite 3100
Miami Florida 33131
Telephone: (786) 913-4880
Jennifer.altman@pillsburylaw.com
markenzy.lapointe@pillsburylaw.com

Ashley E. Cowgill, Esq.
PILLSBURY WINTRHOP SHAW
PITTMAN LLP
500 Capitol Mall, Suite 1800
Sacramento, CA 95814
ashley.cowgill@pillsburylaw.com

/s/ Jennifer G. Altman_____

*Counsel for The Lampo
Group, LLC*